

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**JAMES O. HINES, JR.**

**Civil Action No. 3:13CV104**

**Plaintiff,**

**v.**

**JUDGE ROBERT E. PAYNE**

**ADP SCREENING AND SELECTION,  
SERVICES, INC, *et al.***

**Defendants.**

**DEFENDANT AUTOMATIC DATA PROCESSING, INC'S  
MOTION FOR JUDICIAL NOTICE**

Defendant, Automatic Data Processing, Inc, ("Automatic"), by and through its undersigned counsel, hereby moves this Court, pursuant to Fed. R. Evid. 201, to take judicial notice of the matters of public court records. The arguments and points of law supporting this request are set forth in the accompanying Memorandum in Support.

Respectfully Submitted,

/s/ Burton F. Dodd

Burton F. Dodd, Esq. (VSB#17800)

Mathew Simpson, Esq.

(Pro Hac Vice Pending)

FISHER & PHILLIPS LLP

1075 Peachtree Street, NE

Atlanta, Georgia 30309

(404) 240-4226 – Telephone

(404) 240-4249 – Facsimile

[bdodd@laborlawyers.com](mailto:bdodd@laborlawyers.com)

[msimpson@laborlawyers.com](mailto:msimpson@laborlawyers.com)

Richard A. Millisor, Esq.

(Admitted Pro Hac Vice)

9150 South Hills Boulevard, Suite 300

Cleveland, OH 44147

(440) 740-2146 – Telephone

(440) 838-8805 – Facsimile

[rmillisor@laborlawyers.com](mailto:rmillisor@laborlawyers.com)

*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of May 2013, I filed a true and correct copy of the foregoing on the Court's Electronic Case Filing System, which will send a notice of electronic filing to:

Leonard A. Bennett, Esq.  
CONSUMER LITIGATION ASSOCIATES, P.C.  
763 J. Clyde Morris Blvd., Suite 1-A  
Newport News, VA 23601  
[lenbennet@clalegal.com](mailto:lenbennet@clalegal.com)

James A. Francis  
John Soumilas  
Geoffrey H. Baskerville  
FRANCIS & MAILMAN, P.C.  
100 South Broad Street  
Philadelphia, PA 19110

*/s/ Burton F. Dodd*

Burton F. Dodd, Esq. (VSB#17800)  
Mathew Simpson, Esq.  
(Pro Hac Vice Pending)  
FISHER & PHILLIPS LLP  
1075 Peachtree Street, NE  
Atlanta, Georgia 30309  
(404) 240-4226 – Telephone  
(404) 240-4249 – Facsimile  
[bdodd@laborlawyers.com](mailto:bdodd@laborlawyers.com)  
[msimpson@laborlawyers.com](mailto:msimpson@laborlawyers.com)

Richard A. Millisor, Esq.  
(Admitted Pro Hac Vice)  
9150 South Hills Boulevard  
Suite 300  
Cleveland, OH 44147  
(440) 740-2146 – Telephone  
(440) 838-8805 – Facsimile  
[rmillisor@laborlawyers.com](mailto:rmillisor@laborlawyers.com)

*Attorneys for Defendant*